

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

DEIRDRE L. STEPHENSON,

Plaintiff,

v.

LADEAN G. HOFFMAN, individually, and  
VALLEY PROTEINS, INC., a foreign for-profit  
business corporation,

Defendants.

Case No.: CIV-21-279-G

**NOTICE OF REMOVAL**

COME NOW Defendants LaDean G. Hoffman and Valley Proteins, Inc. (“Removing Defendants”), under 28 U.S.C. § 1441(a) and (b) and 28 U.S.C. § 1332, files this Notice of Removal.

1. Plaintiff Deirdre L. Stephenson (“Plaintiff”) filed her Petition on February 26, 2021 against the Removing Defendants, in the district court for Custer County, Oklahoma. The case number is CJ-2021-20.

2. Plaintiff’s petition alleges that she suffered personal injuries resulting from an August 5, 2019, automobile accident in Custer County. Plaintiff’s petition seeks compensatory damages in excess of \$75,000.

3. Plaintiff is a citizen of Oklahoma.

4. Defendant Valley Proteins is a citizen of Virginia pursuant to 28 U.S.C. § 1332(C)(1); Valley Proteins is incorporated in Virginia and has its principal place of business in Virginia.

5. Defendant Valley Proteins has not been served with the Petition, but voluntarily filed its Answer following the special reservation of time on March 29, 2021.

6. Defendant Hoffman is a citizen of Texas.

7. This Court has subject matter jurisdiction under 28 U.S.C. § 1332(a)(1) as there is complete diversity of citizenship.

8. The following is a complete list of the process, pleadings, motions, and orders served on Allied:

a. Exhibit 1 – Plaintiff’s Petition

b. Exhibit 2 – Summons issued to Removing Defendant LaDean G.  
Hoffman

c. Exhibit 3 – Special Entry of Appearance and Reservation of Time for  
Removing Defendants.

e. Exhibit 4 – Removing Defendants’ Answers to Plaintiff’s Petition

d. Exhibit 5 – Copy of State Court Docket Sheet

9. Contemporaneous with the filing of this Notice, Removing Defendants will mail a copy of this Notice of Removal together with a Notice of Removal to Federal Court (attached as Exhibit 7) for filing in the District Court of Custer County, Oklahoma. Removing Defendants will also provide a copy of this Notice to Plaintiff.

10. Plaintiff demanded a jury trial in his Petition. Removing Defendants also demand jury trial on any applicable issues.

Respectfully submitted,

By /s/ Rebecca L. Newman  
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**ATTORNEYS FOR DEFENDANTS**  
**LADEAN G. HOFFMAN AND**  
**VALLEY PROTEINS, INC.**

**CERTIFICATE OF SERVICE**

I certify that on March 31, 2021, the above was sent via U.S. Mail to the below counsel of record:

Larry E. Finn, OBA #31551  
Parrish DeVaughn, PLLC  
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Oklahoma City, Oklahoma 73104  
*Attorneys for Plaintiff*

/s/ Rebecca L. Newman  
DAN S. FOLLUO/REBECCA L. NEWMAN